

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>RAS Crane, LLC</b> 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone Number 470-321-7112 Attorneys For Secured Creditor <b>The Bank Of New York Mellon Corporation As Trustee For Structured Asset Mortgage Investments II Inc. Mortgage Pass-Through Certificates Series 2006-AR6</b>  Laura Eggerman, Esq. (LE-8250)	CASE NO.: 19-27242-MBK  CHAPTER 13
<b>In Re:</b>  <b>Peter Lloyd Walch and Patricia Maxine Walch,</b>  <b>Debtors.</b>	

**AMENDED OBJECTION TO CONFIRMATION  
OF DEBTORS' CHAPTER 13 PLAN**

The Bank Of New York Mellon Corporation As Trustee For Structured Asset Mortgage Investments II Inc. Mortgage Pass-Through Certificates Series 2006-AR6 ("Secured Creditor"), by and through its undersigned counsel, hereby amends its objection (Docket #15) to confirmation of Debtors' Chapter 13 Plan (Docket # 2), and states as follows:

1. Debtor, Peter Lloyd Walch, and Joint Debtor, Patricia Maxine Walch ("Debtors") filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on September 6, 2019.
2. Secured Creditor holds a security interest in the Debtor's real property located at 20 Corso Reale, Morganville, NJ 07751, by virtue of a Mortgage recorded on May 30, 2006 in Book OR-8567, at Page 3072 of the Public Records of Monmouth County, NJ. Said Mortgage secures a Note in the amount of \$1,470,000.00.
3. The Debtor filed a Chapter 13 Plan on September 6, 2019.
4. The Plan provides unclear treatment of Secured Creditor's claim. The Plan proposes a Loan Modification on the property, but does not specify the creditor. Debtor's Petition

lists Nationstar/Mr. Cooper and Specialized Loan Services as Secured Creditors on the property. Simultaneously, the Plan also lists Secured Creditor as unaffected. Debtor's Petition lists Nationstar/Mr. Cooper and Specialized Loan Services as Secured Creditors on the property. Secured Creditor objects to the Plan and seeks clarification as to Debtor's intentions in regard to the real property and claim.

5. Debtors' secured debt exceeds the limits of §109(e) and, accordingly, the case should convert to Chapter 11 or Chapter 7.

6. The Plan does not appear feasible due to inadequate treatment of Secured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

**WHEREFORE**, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtors' Plan, and for such other and further relief as the Court may deem just and proper.

RAS Crane, LLC  
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Telephone Number 470-321-7112

By: /s/Laura Egerman  
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**CERTIFICATION OF SERVICE**

1. I, Laura Egerman, represent The Bank of New York Mellon Corporation as Trustee for Structured Asset Mortgage Investments II Inc. Mortgage Pass-Through Certificates Series 2006-AR6 in this matter.
2. On December 27, 2019, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Amended Objection to Confirmation of Debtors' Chapter 13 Plan
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

December 27, 2019

RAS Crane, LLC  
Attorney for Secured Creditor  
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Duluth, GA 30097  
Telephone Number 470-321-7112

By: /s/Laura Egerman  
Laura Egerman, Esquire  
NJ Bar Number LE-8250

Email: legerman@rasnj.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Edward Hanratty 80 Court St. Freehold, NJ 07728	Attorney for Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Peter Lloyd Walch 20 Corso Reale Morganville, NJ 07751-4463  Patricia Maxine Walch 20 Corso Reale Morganville, NJ 07751-4463	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Chapter 13 Standing Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)